

Key Ideas: Advice for implemented Recommendations and alternative approaches

Please see the table below as a supplement to the HATF recommendation Table set out in Appendix B to CS-17-23. Below, several key ideas for consideration are highlighted in **bold** text.

Recommendation	Support/Oppose	Comments/Advice/Suggestion
2	Support	Please consider the City's submissions (please refer to details in associated staff reports and ERO submissions)
3a	Support	The municipality is considering pursuing this locally and while the principle is supported local flexibility will be key in achieving multiple objectives.
3b	Support	The City expresses very cautious support of this recommendation while also insisting on full study. Such a study would at a minimum need to fully address human health and safety and long-term energy efficiency objectives, alongside other OBC objectives. The reduction and/or elimination of any egress and or exit facilities should never be combined with the terminology of affordable construction. The ongoing health/safety of building occupants is paramount and should never be compromised for the fiscal reduction of construction costs.
4	Support	Do not support "residential only" conversions and would strongly recommend requiring mixed use to represent true mixed use that retains the same number of jobs. Retaining space for jobs is critical, in particular in municipalities with limited employment area, fledgling mixed use areas, and no opportunities to create new employment areas. A blanket approach to conversions could impact medium and long term employment supply, making it difficult to keep up with population growth associated with the Housing Pledge.
5	Support	The municipality recommends the consideration of a province wide incentive program. The impact of the incentive could include working in partnership with affordable housing waiting lists to address needs.
7	Support	While not exactly as written the Province could take leadership in considering opportunities such as the Community Hub model to lease and reuse space in existing provincially funded schools in order to allow time for neighbourhood lifecycle changes which will welcome new families over the longer term driving school enrollment in the medium and longer term.
8	Support	Many municipalities are close to setting out permissions in and around MTSA's in accordance with the Planning Act. Municipalities are taking ambitious approaches to their MTSA's. This work will clearly demonstrate permissions are sufficient to meet Provincial density targets.

9	Oppose	While we oppose this right now, the City's new Official Plan enshrines heights of 6 -11 storeys, however the Official Plan is under appeal. While the Official Plan does not eliminate parking minimums the City is taking an ambitious approach to parking in the MTSA's. This may be an appropriate tool to consider in the longer term.
12a	Oppose	Unsure how this has been implemented. The municipality would appreciate a better understanding of this item.
12 c	Oppose	While in general a province-wide standard for zoning is not supported, a set of Provincial guidelines would be an excellent tool to describe Provincial expectations but allow for local implementation.
15	Support	Support the inclusion of mandatory delegation of minor variances to staff.
16a	Support	Note cautious support.
16b	Support	Note cautious support.
18	Oppose	Reconsider this recommendation. If Minister approves an Official Plan or Municipal Comprehensive Review there should be little to no leave for appeal with respect to implementing key Provincial policy directions. This could be a key means of reducing OLT case load and ensuring the efficient implementation of key Provincially approved directions enshrined in Regional Official Plans into Local Official Plans.
19	Support	The municipality has adapted to these new legislated timelines. Anecdotally, this change appears to be leading to more appeals undermining opportunities to relieve OLT case load. Consider new approaches to incentivizing applicants to move forward together to work through challenging development issues – particularly within intensification areas. In addition, if timelines are legislated then ALL stakeholders especially those external to the municipality (MTO, MOE, CH, NEC etc) should be committed to supporting municipalities in meeting those timelines.
20	Support	Unsure how this has been implemented. The municipality would appreciate a better understanding of this item.
21	Support	Willing to consider opportunities to put more responsibility to applicants. The City is considering new approaches through the development of a CPPS for the MTSA areas and should be a good test case for supporting moving through expedited approvals with conditions and agreements.
22	Support	Please consider the City's submissions (please refer to details in associated staff reports and ERO submissions)
23	Support	While in general a province-wide standard for Draft Plans of Subdivision/ standard conditions is generally supported,

		a set of Provincial guidelines would be an excellent tool to describe Provincial expectations but allow for local implementation.
25	Oppose	<p>Support Letters of Credit: Presently the municipality makes use of letters of credit, as it binds the applicant to payment if the work is not complete and further recourse is very clear when work is not performed, and the municipality will draw on the letter of credit.</p> <p>Oppose Surety Bonds: Surety bond guarantees work will be performed, however if there is default on the work or issue with performance there is no clear recourse to collect payment, and results in litigation, that is costly, lengthy for both parties. Understanding that in the short term it is a cheaper instrument for the applicant to provide, it presents significant challenges for a municipality in the event of default, and doesn't reflect any secured financial obligation should the applicant need to address payment, as such the municipality would not support the use of surety bonds.</p>
26	Support	<p>There are a number of opportunities to improve and standardize OLT processes. The City would encourage considering these opportunities and others to streamline files at the OLT.</p> <p>The Province/OLT could consider developing mandatory templates for structuring of appeals which requires appellants to indicate specific policies/schedules/tables/definitions being appealed, whether this is required in the appeal letter or at the time the master issues list is developed. A mandatory template for Master Issues list could also be developed. Opportunities to build consistency in the administrative process, the more quickly appellants and municipalities will be in a position to confirm the issues and develop the appropriate procedural orders.</p> <p>The Province could consider AODA requirements in the preparation and distribution of documents- for example, the City receives scanned copies of the appeal letters from the Region which are not AODA compliant and therefore cannot be posted on our website. This results in additional administrative burden to the City. All materials submitted by an appellant in an appeal should be AODA compliant and should include digital (not scanned) copies. This standard (digital copies) also enhances the ability to utilize digital tools to assist with sorting and analysis.</p>

		There are many opportunities to standardize tracking including new standards for the requirements for the municipal record. This could also support appellants, approval authority and other parties in indicating precisely which policies they are appealing if it were made publicly available.
27a	Support	The municipality is supportive of the Province's announcement to consider the affordable housing definition. The outcome of that definition is an important element of this recommendation.
29	Oppose	This recommendation may unintentionally penalize the municipality when the opportunity for influence should be focused on making it easier for all parties to collaborate and improve the quality of the application. The City recommends looking for other opportunities to incentivize applicants to create complete and comprehensive applications. The City's approach to CPPS is looking for opportunities to incentivize early collaboration to support moving through an expedited approval process.
31	Support	Consider broadening this to include supporting the resolution of OPR or new Official Plans (or portions thereof) due to their potential to as-of-right open up opportunities for new housing.
34	Oppose	The changes from Bill 23 support a higher interest rate in most cases than a municipalities borrowing rate. The City supports the change to the Act supportive of a higher rate than recommended through the HATF.
43	Support	In light of doing everything in the City's power to achieve the 29,000 would be in favour of incentivizing development in the near term.
44	Support	Encourage moving first through the Regional review and consider support for this in the medium/long term.
48	Support	The municipality only sets out policy, regulation and issues permits. It is important to continue to reiterate that municipalities do not control shovels in the ground and should not be penalized for falling short on: a) Annual housing growth that meets or exceeds provincial targets.
51	Oppose	Recommend building in flexibility to ensure local understanding, including market and trends forms part of long term population and employment forecasting. Local approaches will also support working with local / regional infrastructure providers.

52	Support	Legislated data requirements a good start – local municipalities will continue to identify other data to track and report.
B-2	Support	The Provincial announcement of the further consideration of the Affordable Housing definition is applauded.
B-4	Support	While not the tool outlined in the recommendation the CPPS as a good tool to support affordable housing in key areas for the City. Encourage continued support for creating flexible and responsive tools to create new affordable units.
B-5	Support	CPPS as a good tool to support affordable housing in key areas for the City. Encourage continued support for creating flexible and responsive tools to create new affordable units.
C-3	Support	Highlight an opportunity to clarify that this recommendation should be limited to previously developed land. The Province could consider a wide range of innovative approaches such as land leases to ensure the creation of affordable units that can be secured in the long term.
C4	Oppose	Very supportive of selling well-located crown land and reoccupying in a higher density building. Recommend opposing over the potential to move services to the fringe could undermine accessibility and could overall increase cost of living/limit accessibility.